

FINAL TEAM REPORT

February 4, 2002

Directive Number and Title: DOE O 151.1A, "Comprehensive Emergency Management System"

Originating Office: Office of Emergency Operations (SO-40)

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Background

Emergency management programs provide the final barrier of DOE's defense-in-depth concept for ensuring the safety and health of workers and the public and for protecting property and the environment in the event of an emergency. Emergency management programs enable organizations to respond to an emergency in a timely, efficient, and effective manner, resulting in improved mitigation of consequences. Emergency management programs are developed and maintained to ensure adequate response for many potential accident scenarios and to provide the framework for responding to accident scenarios not specifically considered.

DOE O 151.1A is the most recent emergency management directive in a succession of directives dating back to 1981 when the Department directed nuclear sites and facilities to have emergency planning, preparedness, and response programs comparable to those in the commercial nuclear industry. (See DOE 5500.3, REACTOR AND NONREACTOR NUCLEAR FACILITY EMERGENCY PLANNING, PREPAREDNESS, AND RESPONSE PROGRAM FOR DOE OPERATIONS, of 8-13-81.)

Major chemical accidents in Bhopal, India, in 1984, and Institute, West Virginia, in 1985, focused increase attention on emergency planning, preparedness, and response for chemicals. Legislation such as the Emergency Planning and Community Right-to-Know Act of 1986 and the Clean Air Act Amendments of 1990 directed major changes in emergency planning, preparedness, and response requirements. Considering these factors and the large number of chemicals in routine use throughout DOE, the Department promulgated a number of directives in the 5500-series in 1991 that integrated chemical and nuclear emergency planning, preparedness, and response requirements. With the issuance of DOE O 151.1 in 1995, the 5500-series directives were consolidated in number and expanded in scope to include consideration of all hazards in emergency planning, preparedness, and response. DOE O 151.1 included the first specific Contractors Requirement Document (CRD). DOE O 151.1A provided updates to include the National Nuclear Security Administration and other organizational changes in the Department.

Overview of Requirements

Emergency management requirements for radioactive materials have evolved separately from the requirements for chemical materials. Requirements for biological materials are still evolving. A variety of Federal agencies have promulgated a variety of not-apparently-consistent requirements for emergency management purposes ranging from protection of workers to protection of the public and the environment. Other DOE directives have incorporated similar not-apparently-consistent requirements that impact the emergency management programs at sites and facilities.

DOE O 151.1A establishes requirements for comprehensive planning, preparedness, response, and recovery activities of emergency management programs for DOE sites and facilities. The primary objective is to effectively integrate planning, preparedness, and response activities into a comprehensive, all-emergency management concept. DOE O 151.1A provides a set of requirements that allow sites and facilities to develop comprehensive emergency management programs to satisfy a variety of regulatory requirements.

Since 1991, the set of emergency management requirements has been applied to specific sites and facilities through a "commensurate with hazards" analysis approach. This approach, which requires identification of hazards and an assessment of their impacts, enables the tailoring of emergency management requirements for planning, preparedness, and response to the potential hazards and work associated with specific Departmental sites and facilities. With identification of hazards and an appropriate assessment of their impacts, other tailoring approaches developed subsequent to 1991, such as the Work Smart Standards suggested in the Integrated Safety Management guidance, DOE G 450.3-3, TAILORING FOR INTEGRATED SAFETY MANAGEMENT APPLICATIONS, can achieve equivalent results to the "commensurate with hazards" approach for emergency management programs, particularly when DOE O 151.1A is included in the agreed upon set of standards. DOE O 151.1A also provides the mechanism for ensuring effective emergency planning, preparedness, and response at both the worker and facility level (like Work Smart Standards) and at the broader operational and strategic levels of the Field and Headquarters elements. Successful implementation of DOE O 151.1A is meant to eliminate unproductive or unnecessary features or activities that add to the implementation costs of emergency management programs, without adding substantially to the level of protection of workers, the public, and the environment.

DOE 151.1A provides requirements to address common elements of emergency management programs. These requirements cover: hazards survey/hazards assessment; program administration; training and drills; exercises; readiness assurance; emergency response organization; offsite response interfaces; emergency facilities and equipment; categorization and classification; communication and notification; consequence assessment; protective actions and reentry; emergency medical support; emergency public information; and, termination and recovery.

DOE O 151.1 was the first emergency management directive to include a CRD, thereby satisfying the requirements for a CRD that were included in DOE O 251.1, published in October 1995. The purpose of the CRD was to develop requirements for inclusion in contracts without invoking the entire directive. Guidance provided by the directives management organization at that time essentially limited the CRD to one page.

The CRD for DOE O 151.1A, which was unchanged from the issuance of the CRD for DOE O 151.1, included 15 requirements that were meant to: 1) address key aspects of the Order; and, 2) identify contractor-specific requirements that should not be confused with requirements for DOE organizations.

Analysis

We have concluded that the Order still needs to apply to contractors. We believe that the contractor requirements document could benefit from a less bureaucratic, more efficient approach. Contractors should not be tasked outside of the CRD.

Changes to DOE O 151.1A, must also address the new realities that recent events have illuminated.

New Realities

The Department needs to address the ramifications of the "911" event. This event may have changed the extent of consideration of extreme malevolent acts as part of the emergency planning process as well as Departmental responsibilities for homeland security. Any updates/changes to DOE O 151.1A should consider these aspects.

Similarly, the Order needs to be updated to reflect new Federal directives promulgated since September 11, 2001, such as Executive Order Establishing Office of Homeland Security (Oct 8), Executive Order on Critical Infrastructure Protection (Oct 16), and Executive Order on Citizen Preparedness in War on Terrorism (Nov 9).

Any changes/updates to DOE O 151.1A should be fully coordinated with all DOE line programs and EH.

Summary Recommendations

We recommend that DOE 151.1A be retained with changes to the CRD to appropriately contain all contractor responsibilities, and with changes to address post-September 11 Federal directives.

Minority Views

None.

Originating Office Comments

None